

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

SECURITIES AND EXCHANGE	)	
COMMISSION,	)	
	)	
Plaintiff,	)	JUDGE DAVID A. RUIZ
v.	)	
	)	CASE NO. 1:23-CV-1853
MATTHEW M. MOTIL,	)	
NORTH SHORE EQUITY SALES, LLC, d/b/a	)	
THE MARIE PAUL COMPANY,	)	<b><u>DEFENDANTS' JOINT STATUS</u></b>
NORTH SHORE EQUITY MANAGEMENT,	)	<b><u>REPORT</u></b>
LLC,	)	
Defendants,	)	
	)	
AMY DOUBRAVA MOTIL,	)	
	)	
Relief Defendant.	)	

Now come Defendants Matthew M. Motil (“Mr. Motil”), North Shore Equity Sales, LLC, d/b/a The Marie Paul Company (“MPC”), North Shore Equity Management, LLC (“North Shore Management” and together, with MPC, the “Companies” and together, with Mr. Motil, the “Motil Defendants”) and Relief Defendant Amy Doubrava Motil (“Mrs. Motil” and together with Mr. Motil and the Companies, the “Defendants”) by and through their respective undersigned counsel, and hereby respectfully provide the Court with this status report.

On December 18, 2024, the Court held a Zoom conference with all Parties to discuss the status of the criminal case against Mr. Motil. At the time, Mr. Motil’s sentencing in the criminal matter was scheduled for January 23, 2025. To preserve party and judicial resources in this case, the Court ordered a joint status report be filed on or before March 10, 2025—after the criminal sentencing. Since our last meeting, Mr. Motil’s sentencing was again continued and is currently scheduled for April 9, 2025. (*See Order Granting Defendant’s Motion to Continue Sentencing*, ECF No. 18, *United States v. Matthew Motil*, Case No. 1:24-CR-00289 (N.D. Ohio).). Among the

reasons for the continuance was that important information from the state court receivership action had not been compiled or disclosed to undersigned defense counsel or the government. This information is important for determining an accurate criminal restitution figure which could have a meaningful impact on the ability to resolve this pending SEC matter.

To continue to preserve party resources, to maximize recovery to investors, and to promote judicial economy, the Defendants respectfully request that this Court schedule the next joint status update or status conference after Mr. Motil is sentenced on April 9, 2025.

Defendants have conferred with counsel for the SEC regarding this requested relief, and the SEC consents to, and joins in this request. The Defendants assert that they will continue to provide this Court, and all parties, with updates on the progress of the criminal case and any other issues that may affect the resolution of this matter.

Respectfully submitted,

/s/ Paul M. Flannery

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*Attorneys for Relief Defendant Amy Doubrava Motil*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 6, 2025, a copy of the foregoing was filed electronically.  
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

*/s/ Paul M. Flannery*

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*Attorney for Motil Defendants*